UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff.

vs.

KAREN ANITA TUCKER, aka KARYN ANITA TUCKER,

INDICTMENT

Defendant.

The Grand Jury charges:

COUNT 1 (Bank Fraud)

Between on or about March 27, 2021 and on or about October 7, 2021, in Berrien County, in the Southern Division of the Western District of Michigan, and elsewhere,

KAREN ANITA TUCKER, aka KARYN ANITA TUCKER,

knowingly, and with the intent to defraud, executed a scheme and artifice to obtain, by means of false and fraudulent pretenses, representations, and promises, moneys and funds owned by, and under the control of, Horizon Bank, a financial institution, by submitting a Paycheck Protection Program (PPP) loan application for "Stevie's Housing," a fictitious property management business, which resulted in a deposit of \$20,833 in loan proceeds in a bank account the defendant controlled.

18 U.S.C. § 1344(2)

18 U.S.C. § 20

COUNTS 2-5 (Wire Fraud)

From on or about May 17, 2020 to on or about May 20, 2020 in Berrien County, in the Southern Division of the Western District of Michigan, and elsewhere,

KAREN ANITA TUCKER, aka KARYN ANITA TUCKER,

having knowingly devised a scheme and artifice to defraud, and to obtain money by means of false and fraudulent pretenses and representations, caused signs, sounds, and signals to be transmitted by wire in interstate commerce for the purpose of executing the scheme.

The defendant electronically submitted an application for Unemployment Insurance (UI), Pandemic Unemployment Assistance (PUA) benefits to the Michigan Unemployment Insurance Agency (UIA), and thereby caused UIA to deposit approximately \$9857.93 into accounts she controlled. The defendant falsely represented that she was Gabriel Dudley, and filed the claim using his personally identifying information, without his knowledge or consent.

For the purpose of executing the scheme and artifice, the defendant knowingly and intentionally transmitted, and caused to be transmitted, by means of wire communication in interstate commerce the following writings, signs, signals, pictures, and sounds:

COUNT	DATE	DESCRIPTION
2	May 17, 2020	Initial application for Michigan UI PUA benefits,
		claim no. 1-932-060-896.
3	May 20, 2020	Deposit of \$4917.66 in Michigan UI benefits for
		"GK Dudley" to defendant's Horizon Bank account
		ending in 2198.
4	January 13, 2022	Deposit of \$949.38 in Michigan UI benefits for
		"Dudley, GK" to defendant's Horizon Bank
		account ending in 4514.
5	February 28,	Deposit of \$5,253.69 in Michigan UI benefits for
	2022	"Dudley, GK" to defendant's Horizon Bank
		account ending in 4514.

18 U.S.C. § 1343

A TRUE BILL

[/s/ Redacted]

GRAND JURY FOREPERSON

MARK A. TOTTEN United States Attorney

NILS R. KESSLER

Assistant United States Attorney